

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

<b>GWACS ARMORY, LLC,</b>	)	<b>Case No. 4:20-cv-341-JDR-SH</b>
	)	
<b>Plaintiff,</b>	)	
	)	<b>Date of Pretrial Conf.: 1/27/2025</b>
<b>KE ARMS, LLC,</b>	)	<b>Time of Settlement Conf.: 1:30pm CT</b>
	)	<b>Judge: John D. Russell</b>
<b>Defendant</b>	)	

**UNOPPOSED MOTION FOR DEFENDANT KE ARMS, LLC TO ATTEND  
PRETRIAL CONFERENCE REMOTELY**

Pursuant to Dkt. 233, Defendant KE Arms, LLC, (“KEA”) hereby files their Unopposed Motion to Attend Pretrial Conference Remotely (“Motion”). This unopposed motion is made and based upon the attached memorandum of points and authorities, the existing exhibits and evidence on the record, the exhibits and evidence attached hereto, and any oral argument permitted by the Court at hearing on this matter.

**MEMORANDUM OF POINTS AND AUTHORITIES**

The Court set a pretrial conference for January 27, 2025. The out-of-state Counsel for the Defendant reside in Las Vegas, Nevada, and traveling to Oklahoma twice in a two-week period, for the pretrial conference and trial, will generate substantial fees, costs and time for the Defendant. Additionally, the representative for the Defendant lives in Arizona, is responsible for his family’s medical needs in Tucson, and will be unable secure replacement medical care prior to the pretrial conference. Accordingly, KEA and KEA’s counsel petition the Court for approval to appear for the Pretrial Conference via teleconference or video.

Moreover, prior to making the instant request, counsel for KEA reached out to counsel for plaintiff and confirmed the Plaintiff does not oppose KEA remotely attending the settlement

conference. Thus, to save time and costs, Defendant KEA and its representative respectfully request approval to attend the Pretrial Conference remotely.

Based on the foregoing, KEA and KEA's counsel respectfully request that this Court grant their request to appear for the Pretrial Conference via teleconference or video.

Dated this 17th day of January, 2025.

Respectfully submitted by:

**HALL ESTILL**

/s/ Robert P. Fitz-Patrick  
Robert P. Fitz-Patrick, OBA #14713  
521 East 2<sup>nd</sup> Street  
Tulsa, OK 74120  
Telephone: (918) 594-0400  
Facsimile: (918) 594-0505  
Email: [rfitzpatrick@hallestill.com](mailto:rfitzpatrick@hallestill.com)

**AND**

**MARQUIS AURBACH**

/s/ Alexander K. Calaway  
Brian R. Hardy, Esq.  
Nevada Bar No. 10068  
*Admitted Pro Hac Vice*  
Alexander K. Calaway, Esq.  
Nevada Bar No. 15188  
*Admitted Pro Hac Vice*  
10001 Park Run Drive  
Las Vegas, Nevada 89145  
Tel: 702-382-0711  
[bhardy@maclaw.com](mailto:bhardy@maclaw.com)  
[acalaway@maclaw.com](mailto:acalaway@maclaw.com)

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing document with the Clerk of the Court for the United States District Court by using the court's CM/ECF system on the 17th day of January, 2025. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

James E. Weger, Esq.  
Tadd J.P. Bogan, Esq.  
JONES, GOTCHER & BOGAN, P.C.  
3800 First Place Tower  
15 East Fifth Street  
Tulsa, OK 74103  
*Attorneys for Plaintiff, GWACS Armory, LLC*

/s/ C. Hatfield